

United States Bankruptcy Court
Southern District of New York
Manhattan Division

In Re RESIDENTIAL CAPITAL, LLC, et al,)	Debtor Case No. <u>12-12020</u>
Debtors)	(jointly administered)
)	
)	Chapter <u>11</u>

AFFIDAVIT OF MARIE MCDONNELL

Being duly sworn, Marie McDonnell hereby deposes under pains and penalties of perjury as follows:

1. I am over the age of eighteen and believe in the obligations of an oath.
2. I am a Mortgage Fraud and Forensic Analyst, and a credentialed Certified Fraud Examiner (“CFE”) with twenty-six (26) years’ experience in transactional analysis, mortgage auditing, and mortgage fraud investigation. (See Affidavit Exhibit 4. - Resume of Marie McDonnell)
3. I am the founder and managing member of Truth In Lending Audit & Recovery Services, LLC having a principal place of business at 15 Cape Lane, Brewster, Massachusetts 02631. I am also the President of McDonnell Property Analytics, a litigation support and research firm that provides mortgage-backed securities research services and foreclosure forensics to attorneys nationwide. McDonnell Property Analytics also advises and performs services for county registers of deeds, attorneys general, courts and other governmental agencies that are dealing with the fallout from the nation’s largest banks’ unsafe and unsound mortgage lending practices responsible for the financial crisis of 2008.
4. I was engaged by the plaintiff Thomas J. LaCasse to conduct an audit of the Note and Mortgage (“Mortgage Loan”) he executed in favor of Homecomings Financial Network, Inc. on January 30, 2006 secured by the subject premises at 153 Valley Forge Road, Weston, Fairfield County, Connecticut 06883.
5. In the ordinary course of business I reviewed relevant documents and conducted research in order to trace the ownership history of the subject Mortgage Loan. I explained my methodology and detailed my findings in a Foreclosure Forensics report on March 16, 2012 (“Report”).
6. I formed an expert opinion as of that date and concluded that the Note and Mortgage in the underlying foreclosure matter were not owned by Residential Funding Company, LLC, but rather, the evidence I unearthed shows that the Mortgage Loan had been securitized and was allegedly conveyed to HSBC Bank USA, National Association as Trustee for the Luminent Mortgage Trust 2006-3 on April 28, 2006.
7. My Foreclosure Forensics report is based on credible evidence gathered from publicly available information filed with the Securities and Exchange Commission, and privately held information

obtainable through the Bloomberg Professional Service, a robust database of residential mortgage-backed securities (“RMBS”). My Report explains how the subject Mortgage Loan was securitized and is summarized succinctly on page 16, paragraph 29 which states as follows:

According to the representations and warranties made to investors and to adhere strictly to the terms of Section 2.01 of the Pooling and Servicing Agreement the LaCasse Note and Mortgage would have been transferred and assigned into the REMIC Trust as follows:

- A. from the *Lender* (Homecomings Financial Network, Inc.) to the *Originator* (Residential Funding Corporation);
- B. from the *Originator* (Residential Funding Corporation) to the *Seller/Sponsor* (Maia Mortgage Finance Statutory Trust / Luminent Mortgage Capital, Inc.);
- C. from the *Seller/Sponsor* (Maia Mortgage Finance Statutory Trust / Luminent Mortgage Capital, Inc.) to the *Depositor* (Structured Asset Mortgage Investments II Inc.); and finally,
- D. from the *Depositor* (Structured Asset Mortgage Investments II Inc.), to
- E. the Trustee for the *Issuing Entity*, (HSBC Bank USA, National Association, as Trustee for Certificateholders of Structured Asset Mortgage Investments II Inc., Luminent Mortgage Trust 2006-3, Mortgage Pass-Through Certificates, Series 2006-3).

8. Whereas it may be true that Residential Funding Company (“RFC”) owned the LaCasse Mortgage Loan at one time, it surrendered all right, title and interest therein on or before April 28, 2006 when the Luminent Mortgage Trust 2006-3 closed.
9. Exhibit “C” to my Report is a document supplied by RFC which purports to be an Allonge To Promissory Note (“Allonge”) that contains an endorsement in blank executed by John Hagebeck in his capacity as Assistant Vice President of Residential Funding Company. This blank endorsement constitutes *prima facie* evidence that RFC sold the LaCasse Note. (See Affidavit Exhibit 1. - Allonge To Promissory Note)
10. In addition, the Allonge identifies the LaCasse Note as Loan ID 10419663, which is a precise match to the Loan ID contained in Exhibit “J” to my Report which clearly shows that the subject Mortgage Loan was being tracked as an asset of the **Luminent Mortgage Trust 2006-3 (LUM 2006-3)** as reported by Bloomberg on 02/16/2012.
11. The fact that the Allonge identifies the Loan ID as Number 10419663; the Note Date as 1/30/2006; the Loan Amount as \$650,000.00; the Borrower as Thomas LaCasse; and the Property Address as 153 Valley Forge Road, Weston, Connecticut 06883 eliminates any uncertainty about whether the LaCasse Mortgage Loan is property of the Luminent Mortgage Trust 2006-3.
12. I was asked to re-examine my findings in light of recent litigation and the assertion before this Honorable Bankruptcy Court by Residential Funding Company, LLC, that the Mortgage Loan is now the property of that entity (“RFC”).

13. On October 21, 2013, I reviewed the information as detailed in my earlier Report and updated my Bloomberg research which shows that Thomas LaCasse's Mortgage Loan remains to this day an asset of the Luminent Mortgage Trust 2006-3. (See Affidavit Exhibit 2. - Bloomberg Research Results, 10/21/2013)
14. As noted in my Report, Wells Fargo Bank, N.A. ("Wells Fargo") is the Master Servicer, Document Custodian, and Securities Administrator for the Luminent Mortgage Trust 2006-3. In its most recent periodic report issued to the Certificateholders of the Luminent Mortgage Trust 2006-3 on September 25, 2013, Wells Fargo states on page 25 that the LaCasse Mortgage Loan is presently "in foreclosure." (See Affidavit Exhibit 3. - Monthly Remittance Report, 09/25/2013)
15. Accordingly, I conclude that there has been no change in the beneficial ownership interest in the subject Mortgage Loan since I issued my Foreclosure Forensics report on March 16, 2012.
16. In my opinion, any statement that Residential Funding Company, LLC makes claiming to own the subject Mortgage Loan is belied by the documentary evidence which forms the basis for my opinions in both my Report, and my most recent examination which establish that the Luminent Mortgage Trust 2006-3 has continuously reported that the LaCasse Mortgage Loan is one of its assets.

Executed this twenty-second day of October, 2013 in Brewster, Massachusetts under the pains and penalties of perjury.

FURTHER DEPONENT SAITH NOT



Marie McDonnell, President
McDonnell Property Analytics
Mortgage Fraud and Forensic Analyst
Certified Fraud Examiner, ACFE

Date: October 22, 2013

AFFIDAVIT EXHIBITS:

1. Allonge to Promissory Note
2. Bloomberg Research Results, 10/21/2013
3. Monthly Remittance Report, 09/25/2013
4. Resume of Marie McDonnell

EXHIBIT “1”

Allonge To Promissory Note

AFFIDAVIT OF MARIE MCDONNELL ON BEHALF OF THOMAS J. LACASSE
In Re RESIDENTIAL CAPITAL, LLC, et al., USBC- SDNY, Debtor Case No. 12-12020

ALLONGE TO PROMISSORY NOTE

FOR PURPOSES OF FURTHER ENDORSEMENT OF THE FOLLOWING DESCRIBED NOTE, THIS
ALLONGE IS AFFIXED AND BECOMES A PERMANENT PART OF SAID NOTE

POOL: 3850 LOAN ID: 10419663 

NOTE DATE: 1/30/2006 LOAN AMOUNT: \$650,000.00

BORROWER NAME: THOMAS LACASSE

PROPERTY ADDRESS: 153 VALLEY FORGE ROAD, WESTON, CT 06883

PAY TO THE ORDER OF

WITHOUT RE COURSE

Residential Funding Corporation

By:



Name: John Hagebock

Title: Assistant Vice President

Residential Funding Corporation

EXHIBIT “2”

Bloomberg Research Results
October 21, 2013

Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

The Bloomberg Professional Service's database of residential mortgage backed securities pictured in the screen shot below indicates that the subject Mortgage Loan is being tracked as an asset of the **Luminent Mortgage Trust 2006-3 (LUM 2006-3)** on Line #123 as Loan ID 0010419663 and that it is in Group 3. (See the Prospectus Supplement for more information on the characteristics of the "Group 3" Mortgage Loans.)

<HELP> for explanation.

LUM 06-3 11A1 Mtge 92 Options 93 Quick Filters Feedback Stratification Builder

95) All Collateral As of 09/13

	Count	Current Balance	Deal %	WALT/	Score	Original Balance	WAC	WAM	WALA
All Loans in Group	2263	165,553,055.77	100.00%	74.4	705	683,431,267.01	3.13	286	91
Balance > 0	624	165,553,055.77	100.00%	74.4	705	173,332,551.21	3.13	286	91
Jump to Column			% Clear Filters			Zoom	100%		
Loan ID	Pay History	Balance	Original Balance	Groups	Geo	MSA			
0080016262	CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	616,000.00	676,000.00	5	NY	New York-Northern New Jersey-Long Isl			
0000486928	CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	625,512.37	656,250.00	1	CA	San Jose-Sunnyvale-Santa Clara CA			
0010388743	CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	639,328.76	650,150.00	5	AZ	Phoenix-Mesa-Scottsdale AZ			
0122405080	CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	573,944.46	650,000.00	1	CA	Oxnard-Thousand Oaks-Ventura CA			
0000486597	999999FF966966333C333CCCCBBB	541,981.64	650,000.00	2	CA	San Francisco-Oakland-Fremont CA			
0010419663	FFFFFFF9FFFF9FFFFFFF9FFFFFFF9	649,974.31	650,000.00	3	CT	Bridgeport-Stamford-Norwalk CT			
0080016177	FFFFFFF9FFFFFFF9FFFFFFF9FFFFFF	649,868.27	650,000.00	5	FL	Jacksonville FL			
0010439831	CCCCCCCCCCCCCCCCCCCCCCCCCCCC33CCC	707,369.58	650,000.00	5	CA	Riverside-San Bernardino-Ontario CA			
0000474619	CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	624,217.09	648,800.00	1	CA	San Francisco-Oakland-Fremont CA			
0010330146	C3CCCCCCCCCCCCCCCCCCCCCCCCCCCC	634,675.28	635,000.00	5	VA				
0015994759	FFFFMBBBBBBFBBFFFBBBF9FFFF9	426,911.53	632,000.00	2	VA	Washington-Arlington-Alexandria DC-VA			
0122415782	CC3333C33CC3333CCCCCCCCCCCCCCC	437,369.97	630,819.00	1	CA	Riverside-San Bernardino-Ontario CA			
0122413708	CMCCCCCCCCCCCCCCCCCCCCCCCCCCCC	652,803.24	630,400.00	1	CA	San Francisco-Oakland-Fremont CA			
0000481507	CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC	644,894.67	629,300.00	1	CA	San Jose-Sunnyvale-Santa Clara CA			
0080015962	CCCCCCCCCCCCM9999FFBBFF9FFFF	330,759.55	628,550.00	3	CA	Stockton CA			
0080016121	99999999FF9999M3666333CCCCCCC	684,007.77	628,000.00	5	CA	Los Angeles-Long Beach-Santa Ana CA			
0000486571	M333CCCCCCCCCCC3CCCC39663CCM999	512,592.52	620,000.00	1	CA	San Francisco-Oakland-Fremont CA			
0010427699	C333CCCCCMCMFF9FFFF9FFFF999M	369,154.74	616,000.00	2	CA	Los Angeles-Long Beach-Santa Ana CA			
0010400074	CCCCCCCCCCCCCCCCCCCCCCCCCCCC	400,000.00	414,000.00	5	CA	Los Angeles-Long Beach-Santa Ana CA			

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 SN 553762 EDT GMT-4:00 H428-1449-0 21-Oct-2013 14:05:05

Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

The Security Description screenshot below indicates that the current balance is 23.60% of the original issue and that the Ratings Agencies have downgraded the securities to “junk bond” status.

!!00Q5ZJ Mtge DES

Bloomberg CMO 66 <GO>

SECURITY DESCRIPTION
LUM 2006-3 11A1 .3789% Page 1 of 3
5/25/36

CUSIP: 55027AAR1 Issuer: LUMINENT MORTGAGE TRUST
Series 2006-3 Class 11A1 Col Mty 5/25/36

CMO: FLT,STEP,AFC,IRC,SSNR

CURRENT	ORIGINAL ISSUE
Sep13 23,816,479	USD 100,908,000
" Fact .236021710	WAL 3.3Yr @ 25CPR
Sep13 Cpn .37885%	1st coupon 5.2%
Next Paymt 10/25/13	1st paymnt 5/25/06
Rcd date 10/24/13	1st settle 4/28/06
Beg accrue 9/25/13	Dated date 4/28/06
End accrue 10/24/13	px 4/27/06
Next reset 10/25/13	1st reset 5/25/06
Class/Grp Pct N/A	Class/Grp Pct 54%

4) FLOATER FORMULA
= 1xLIBOR01M +20BP
Cap=10.5% @10.3%
Flr=0.2% @0%
Monthly reset

11) RATINGS
S&P CCC
MDY Caa3

CALLABLE
Lead Mgr: BS
Trustee: HSB

12) VOLATILITY
C.FLUX 0.1

65) Personal Notes 14) Identifiers 2) WHARM 2.71 S 275wam 3.09wac

TRACE Eligible
SMMEA: Yes
DTC Book Entry
DTC SameDay
Clearstream
Euroclear

	Sep13	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan	Dec12	Nov	Oct12
CPR	41.9	45.1	14.6	30.5	.2	.2	28.4	.1	10.5	11.6	20.7	2.3
PSA	699	751	243	509	3.00	3.00	473	1.00	175	193	346	38.0
FACT	.24	.24	.24	.24	.25	.25	.25	.26	.26	.26	.26	.27
CPN	0.38	0.38	0.39	0.39	0.39	0.40	0.40	0.40	0.40	0.41	0.41	0.41

MinSize 25000 Incr 1

See Page 3 for Comments.

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Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

Bloomberg's Collateral Performance screen shot below indicates that as of October 21, 2013 there were 56 loans remaining in Group 3 and that the 60+ day delinquency rate stood at rate of 22.94%.

Collateral Performance									
CUSIP	5) Export	6) Video Tutorial	99 Feedback	99 Buy	99 Sell	10) Group 3 Loans			
81) Classic	82) Delinq	83) Mods	84) Characteristics	85) Speeds	86) Custom	87) Transition	88) All	02/2013	01/2014
LUM 2006-3 11A1 Mtge									
CUSIP 55027AAR1	3.087(275)92								
101) Balance (M)	13,519	13,492	13,504	13,975	13,988	14,219	14,230	14,388	14,400
102) Pool Factor	0.243	0.242	0.242	0.251	0.251	0.255	0.255	0.258	0.258
103) # of Loans	56	56	56	58	58	59	59	60	60
104) WAC	3.095	3.145	3.147	3.151	3.151	3.149	3.202	3.300	3.314
105) Net WAC	2.789	2.839	2.841	2.846	2.846	2.844	2.897	2.995	3.009
106) WAM	278	270	271	272	273	274	275	276	277
107) WALA	91	90	89	88	87	86	85	84	83
108) WALTV (Amort) %	72.36	72.14	72.19	72.32	72.37	72.68	72.73	72.70	72.75
109) HPI LTV (Amort) %	98.04	97.87	97.90	98.15	98.29	98.64	98.65	99.24	99.71
110) LTV > 80%	22.98	18.60	18.59	17.96	17.95	18.81	18.80	18.60	18.59
111) Delinq 30 days %	6.92	1.90	4.26	3.34	1.85	7.64	5.47	6.27	5.96
112) Delinq 60 days %	1.54	4.29	1.92	0.00	0.00	0.00	0.00	1.49	0.00
113) Delinq 90 days %	4.17	3.36	3.36	3.24	3.24	3.19	3.18	3.15	3.15
114) Bankruptcy %	8.63	8.36	8.35	8.07	6.45	6.35	6.34	6.27	6.27
115) Foreclosure %	8.61	8.62	8.62	8.32	9.92	11.39	11.38	12.62	13.62
116) REO %	0.00	0.00	0.00	1.65	1.65	1.38	1.38	1.02	0.00
117) Delinq. 60+ %	22.94	24.62	22.24	21.29	21.27	22.30	22.29	24.54	23.04
118) Delinq. 90+ %	21.41	20.34	20.32	21.29	21.27	22.30	22.29	23.06	23.04
119) Cumul Loss %	16.673	16.673	16.575	16.352	16.344	16.256	16.203	16.031	16.031
120) Second Lien %	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

Bloomberg's View All Classes screen shots below highlight the active tranches in amber. (Page 1 of 2)

!!00Q5ZJ Mtge VAC								
95 Options		View All Classes						
LUM 2006-3 LUMINENT MORTGAGE TRUST								
Template	Classic	30 Classes						
CF	Class	Orig(000)	Curr(000)	Cpn	OWAL	Orig Mty	CUSIP	Tranche Description
1)	* 11A1	100,908	23,816	0.379	3.32	5/25/2036	55027AAR1	FLT, STEP, AFC, IRC, SSNR
2)	* 11A2	50,454	3,324	0.429	3.32	5/25/2036	55027AAS9	MEZ, FLT, STEP, AFC, IRC, SSNR, SSU
3)	Pd11A3	16,818	0	0.494	3.32	5/25/2036	55027AAT7	MEZ, FLT, STEP, AFC, IRC, SSUP
4)	* 12A1	97,258	44,895	0.389	3.36	5/25/2036	55027AAU4	FLT, STEP, AFC, IRC, SSNR
5)	* 12A2	48,629	8,385	0.439	3.36	5/25/2036	55027AAV2	MEZ, FLT, STEP, AFC, IRC, SSNR, SSU
6)	Pd12A3	16,210	0	0.494	3.36	5/25/2036	55027AAW0	MEZ, FLT, STEP, AFC, IRC, SSUP
7)	* 12X	162,097	53,280	1.000	0.00	5/25/2036	55027AAX8	IO, NTL
8)	* 21A1	47,535	13,558	3.037	3.25	4/25/2036	55027AAA8	CSTR, SSNR
9)	Pd21A2	4,096	0	7.276	3.25	4/25/2036	55027AAB6	MEZ, CSTR, SSUP
10)	* 21X1	51,631	13,558	0.522	0.00	4/25/2036	55027AAC4	IO, NTL
11)	* 22A1	147,795	54,348	3.070	3.26	4/25/2036	55027AAD2	CSTR, SSNR
12)	Pd22A2	12,735	0	7.251	3.26	4/25/2036	55027AAE0	MEZ, CSTR, SSUP
13)	* 22X1	160,530	54,348	0.441	0.00	4/25/2036	55027AAF7	IO, NTL
14)	* 23A1	72,093	18,994	2.899	3.26	4/25/2036	55027AAG5	CSTR, SSNR
15)	Pd23A2	6,212	0	7.260	3.26	4/25/2036	55027AAH3	MEZ, CSTR, SSUP
16)	* 23X1	78,305	18,994	0.395	0.00	4/25/2036	55027AAJ9	IO, NTL
17)	Pd1M1	11,809	0	0.564	6.44	5/25/2036	55027AAY6	MEZ, FLT, STEP, AFC, IRC
18)	Pd1M2	7,380	0	0.584	6.36	5/25/2036	55027AAZ3	MEZ, FLT, STEP, AFC, IRC
19)	Pd1M3	2,583	0	0.604	6.29	5/25/2036	55027ABA7	MEZ, FLT, STEP, AFC, IRC
20)	Pd1B1	4,244	0	0.764	6.20	5/25/2036	55027ABB5	SUB, FLT, STEP, AFC, IRC
21)	Pd1B2	1,845	0	0.784	6.10	5/25/2036	55027ABC3	SUB, FLT, STEP, AFC, IRC
22)	Pd1B3	4,982	0	1.934	5.87	5/25/2036	55027ABD1	SUB, FLT, STEP, AFC, IRC
23)	Pd1B4	1,845	0	2.284	5.41	5/25/2036	55027ABE9	SUB, FLT, STEP, AFC, IRC
24)	Pd2B1	11,755	0	0.000	6.12	4/25/2036	55027AAK6	SUB, CSTR

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Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

Bloomberg's View All Classes screen shots below highlight the active tranches in amber. (Page 2 of 2)

!!00Q5ZJ Mtge VAC
Screen saved as C:\Users\nb\Dropbox\BLOOMBERG\LACASSE\VAC (1), 10.21.2013.gif

CF	Class	Orig(000)	Curr(000)	Cpn	OWAL	Orig Mty	CUSIP	Tranche Description
7) *	12X	162,097	53,280	1.000	0.00	5/25/2036	55027AAX8	IO, NTL
8) *	21A1	47,535	13,558	3.037	3.25	4/25/2036	55027AAA8	CSTR, SSNR
9) Pd	21A2	4,096	0	7.276	3.25	4/25/2036	55027AAB6	MEZ, CSTR, SSUP
10) *	21X1	51,631	13,558	0.522	0.00	4/25/2036	55027AAC4	IO, NTL
11) *	22A1	147,795	54,348	3.070	3.26	4/25/2036	55027AAD2	CSTR, SSNR
12) Pd	22A2	12,735	0	7.251	3.26	4/25/2036	55027AAE0	MEZ, CSTR, SSUP
13) *	22X1	160,530	54,348	0.441	0.00	4/25/2036	55027AAF7	IO, NTL
14) *	23A1	72,093	18,994	2.899	3.26	4/25/2036	55027AAG5	CSTR, SSNR
15) Pd	23A2	6,212	0	7.260	3.26	4/25/2036	55027AAH3	MEZ, CSTR, SSUP
16) *	23X1	78,305	18,994	0.395	0.00	4/25/2036	55027AAJ9	IO, NTL
17) Pd	1M1	11,809	0	0.564	6.44	5/25/2036	55027AAY6	MEZ, FLT, STEP, AFC, IRC
18) Pd	1M2	7,380	0	0.584	6.36	5/25/2036	55027AAZ3	MEZ, FLT, STEP, AFC, IRC
19) Pd	1M3	2,583	0	0.604	6.29	5/25/2036	55027ABA7	MEZ, FLT, STEP, AFC, IRC
20) Pd	1B1	4,244	0	0.764	6.20	5/25/2036	55027ABB5	SUB, FLT, STEP, AFC, IRC
21) Pd	1B2	1,845	0	0.784	6.10	5/25/2036	55027ABC3	SUB, FLT, STEP, AFC, IRC
22) Pd	1B3	4,982	0	1.934	5.87	5/25/2036	55027ABD1	SUB, FLT, STEP, AFC, IRC
23) Pd	1B4	1,845	0	2.284	5.41	5/25/2036	55027ABE9	SUB, FLT, STEP, AFC, IRC
24) Pd	2B1	11,755	0	0.000	6.12	4/25/2036	55027AAK6	SUB, CSTR
25) Pd	2B2	3,763	0	0.000	6.12	4/25/2036	55027AAL4	SUB, CSTR
26) Pd	2B3	2,822	0	0.000	6.12	4/25/2036	55027AAM2	SUB, CSTR
27) 1B10	369,025	80,420	0.000	0.00	5/25/2036	55027ABF6	IO, NTL	
28) Pd	2B4	1,879	0	0.000	0.00	4/25/2036	55027AAN0	SUB, CSTR
29) Pd	2B5	1,569	0	0.000	0.00	4/25/2036	55027AAP5	SUB, CSTR
30) Pd	2B6	1,257	0	0.000	0.00	4/25/2036	55027AAQ3	SUB, CSTR

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Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

Bloomberg' Structured Finance Notes in the screen shot below provide a snapshot of several key entities who participated in the **LUM 2006-3** securitization.

<HELP> for explanation, <MENU> for similar functions.

95 Documents ▾ Structured Finance Notes

21) Related Parties 22) Trigger Details

LUM 2006-3

Underwriter	
Lead Manager	Bear Stearns & Co Inc
Co-Manager	Wachovia Capital Markets

Servicer	Trustee
Master Wells Fargo Bank	HSBC Bank
	Paying Agent

Originator/Seller	Asset Manager
	Swap Counterparty
	Wachovia Bank NA

Australia 61 2 9777 8600 Brazil 5511 3048 4500 Europe 44 20 7330 7500 Germany 49 69 9204 1210 Hong Kong 852 2977 6000
Japan 81 3 3201 8900 Singapore 65 6212 1000 U.S. 1 212 318 2000 Copyright 2013 Bloomberg Finance L.P.
SN 553762 EDT GMT-4:00 H428-1449-0 21-Oct-2013 14:08:48



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Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

BLOOMBERG FIELDS	BLOOMBERG LOAN LEVEL DETAILS	LOAN DOCUMENTS	DATA POINTS
Loan ID	10419663	7754073 (Note)* 0425910742 (Mortgage)	1. No Match
Loan ID	10419663	10419663 (Allonge)**	2. Match
Pay History	FFFFFFFFFFFFFF9F FFFFFFFFFFFFFFFB BBBBBBBBBBBFBBFF FFF9963C3CCCCCCC CCCCCCCCCCCCCCC CCC^~~~~~C		
Current Balance	\$649,974.31		
Original Balance	\$650,000.00	\$650,000.00	3. Match
Groups	3		
Geographics	CT	Connecticut	4. Match
MSA	Bridgeport-Stamford-Norwalk CT		
Zip Code	06883	06883	5. Match
Payment Due	\$1,692.64		
Documentation	L		
Original LTV	54		
Amortized LTV	54		
HPI Adjusted LTV	67		
Age	91		
Months to Maturity	269		
Loan Type	ARM	Adjustable Rate Note	6. Match
ARM Index	US0012M	LIBOR One-Year	7. Match
ARM Initial Reset	37		
ARM Reset Freq	12		
ARM Lifetime Cap	12.5	12.5000%	8. Match
ARM Lifetime Floor	2.25	2.2500%	9. Match



www.mcdonnellanalytics.com

Bloomberg Research Results

October 22, 2013

Borrower: Thomas LaCasse

Lender: Homecomings Financial Network, Inc.

Date of Transaction: January 30, 2006

BLOOMBERG FIELDS	BLOOMBERG LOAN LEVEL DETAILS	LOAN DOCUMENTS	DATA POINTS
ARM Periodic Rate Cap	2	2.000%	10. Match
ARM Periodic Rate Floor	2	2.000%	11. Match
ARM Margin	2.25	2.2500%	12. Match
Delinquency Status	F		
Property Type	SF		
Occupancy	Owner Occupied		
Loan Purpose	PR		
Total Fee	0.302		
Lien Status	1		

DATA POINTS – denote instances where information is contained both in the “Bloomberg Loan Level Details” and the “Loan Documents” we reviewed.

- * Loan Numbers are often re-serialized when loans have been pooled for securitization purposes.
 - ** The Allonge To Promissory Note identifies the Loan ID Number as 10419663; the Note Date as 1/30/2006; the Loan Amount as \$650,000.00; the Borrower as Thomas LaCasse; and the Property Address as 153 Valley Forge Road, Weston, Connecticut 06883, which unmistakably corresponds to the Data Points listed above.
- Accordingly, as of October 21, 2013, the LaCasse Mortgage Loan continues to be held as property of the Luminent Mortgage Trust 2006-3.

EXHIBIT “3”

Monthly Remittance Report September 25, 2013

AFFIDAVIT OF MARIE MCDONNELL ON BEHALF OF THOMAS J. LACASSE
In Re RESIDENTIAL CAPITAL, LLC, et al., USBC- SDNY, Debtor Case No. 12-12020

Luminent Mortgage Capital
Mortgage Pass-Through Certificates
Distribution Date: 25-Sep-2013
21-Sep-2013 1:49:19PM

**Luminent Mortgage Capital
Mortgage Pass-Through Certificates
Series 2006-3**

Contact: Customer Service - CTSLink
Wells Fargo Bank, N.A.
Securities Administration Services
8380 Stagecoach Circle
Frederick, MD 21701-4747
www.ctslink.com
Telephone: 1-866-846-4526
Fax: 240-586-8675

Foreclosure Loan Detail - All Mortgage Loans in Foreclosure during Current Period

Group	Loan Number	Month Loan Entered FC	First Payment Date	State	LTV at Origination	Original Principal Balance	Current Actual Balance	Paid To Date	Months Delinquent	Current Loan Rate	Approximate Delinquent Interest
I-2	0016063722	Apr-2012	01-Apr-2006	VA	80.00	404,000.00	439,519.03	01-Feb-2010	42	3.625%	52,188.34
I-2	0016067004	Dec-2009	01-Apr-2006	FL	76.94	400,000.00	439,199.71	01-May-2008	63	3.625%	93,100.48
I-2	0016067005	Nov-2011	01-Apr-2006	FL	80.00	217,600.00	234,843.96	01-Nov-2010	33	3.625%	21,879.51
I-2	0016094470	Dec-2011	01-Apr-2006	FL	80.00	224,000.00	244,792.88	01-Jul-2010	37	3.625%	25,635.06
II-1	0010358007	Apr-2009	01-Mar-2006	FL	62.61	335,000.00	334,999.99	01-Sep-2008	59	3.125%	58,366.75
II-1	0010419663	Jul-2012	01-Mar-2006	CT	54.16	650,000.00	649,974.31	01-Dec-2008	56	3.125%	104,795.01
II-1	0080015951	Oct-2012	01-Mar-2006	MD	80.00	178,400.00	178,400.00	01-May-2009	51	3.125%	24,957.29
II-2	0010316658	May-2013	01-Mar-2006	IL	77.87	292,000.00	258,169.34	01-Jan-2013	7	3.125%	5,296.98
II-2	0010319588	Apr-2008	01-Apr-2006	FL	80.00	236,000.00	236,000.00	01-Oct-2007	71	3.125%	72,564.92
II-2	0010348137	Oct-2012	01-Feb-2006	FL	80.00	218,160.00	218,160.00	01-May-2009	51	3.875%	46,513.57
II-2	0010380819	Dec-2012	01-Feb-2006	CA	63.38	253,500.00	241,672.18	01-Mar-2012	17	2.625%	9,878.30
II-2	0010414599	Jun-2012	01-Mar-2006	FL	80.00	88,000.00	87,920.39	01-Sep-2011	23	3.125%	5,339.38
II-2	0010417175	Apr-2013	01-Mar-2006	VA	80.00	258,600.00	258,285.74	01-Oct-2012	10	3.125%	7,565.65
II-2	0010434097	May-2010	01-Mar-2006	FL	80.00	243,920.00	243,920.00	01-Sep-2009	47	3.125%	40,333.35
II-2	0010442389	Jul-2013	01-Apr-2006	AK	80.00	329,600.00	329,600.00	01-Jan-2013	7	3.125%	7,189.38
II-2	0010456351	Mar-2009	01-Apr-2006	FL	80.00	121,600.00	121,600.00	01-Sep-2008	59	3.125%	26,252.85
II-2	0010475377	Oct-2012	01-Apr-2006	SC	90.00	147,208.00	147,024.09	01-Apr-2012	16	3.125%	6,597.72
II-2	0080016009	Jul-2013	01-Mar-2006	OR	80.00	178,080.00	178,080.00	01-Feb-2013	6	3.125%	3,450.30
II-2	0080016026	Aug-2013	01-Mar-2006	FL	80.00	328,000.00	229,571.67	01-Mar-2013	5	2.000%	3,421.15
II-2	0080016040	Apr-2013	01-Mar-2006	WA	79.98	237,000.00	271,681.40	01-Aug-2012	12	4.000%	8,658.63
II-2	0080016049	Aug-2012	01-Mar-2006	FL	75.00	183,750.00	183,563.89	01-Jan-2010	43	3.125%	28,853.99
II-2	0080016055	Jun-2013	01-Mar-2006	CO	80.00	183,920.00	183,920.00	01-Nov-2012	9	3.125%	5,000.32
II-2	0080016098	Nov-2010	01-Mar-2006	FL	80.00	182,400.00	180,841.10	01-Mar-2010	41	3.125%	24,959.70
II-2	0080016122	Jan-2012	01-Mar-2006	FL	80.00	220,800.00	220,800.00	01-Jun-2008	62	3.125%	62,215.00
II-2	0080016123	May-2013	01-Mar-2006	FL	80.00	238,400.00	238,400.00	01-Jun-2008	62	3.125%	67,174.04
II-2	0080016179	Jul-2013	01-Mar-2006	FL	80.00	166,000.00	163,599.01	01-Feb-2013	6	5.000%	5,155.36
II-2	0080016206	Aug-2011	01-Mar-2006	NJ	80.00	160,000.00	152,764.72	01-Nov-2010	33	4.750%	19,477.80
II-2	0080016211	Sep-2009	01-Mar-2006	NY	80.00	295,960.00	295,960.00	01-May-2008	63	3.125%	76,857.21
II-2	0080016279	Aug-2012	01-Mar-2006	NV	79.98	275,900.00	313,633.02	01-Mar-2012	17	3.000%	13,656.06
II-2	0080016285	Oct-2010	01-Mar-2006	NY	80.00	376,000.00	375,965.00	01-Sep-2009	47	3.125%	63,639.75
II-2	0080016319	Mar-2012	01-Mar-2006	FL	80.00	108,000.00	108,000.00	01-Jan-2008	68	3.125%	33,603.75
II-2	0080016339	Sep-2013	01-Mar-2006	NY	80.00	308,000.00	307,966.63	01-Jul-2009	49	3.125%	55,337.80
II-3	0010479783	Sep-2013	01-Apr-2006	CA	80.00	424,000.00	423,999.99	01-Feb-2013	6	3.125%	8,162.02
II-3	0080016131	Aug-2013	01-Mar-2006	CA	80.00	503,200.00	502,866.14	01-Feb-2013	6	4.000%	12,517.79
II-3	0080016168	Aug-2012	01-Mar-2006	NY	70.00	693,000.00	692,820.99	01-Jun-2008	62	3.125%	195,216.61
II-3	0080016177	Dec-2009	01-Mar-2006	FL	78.79	650,000.00	649,868.27	01-Jul-2009	49	3.125%	119,480.94
II-3	0080016212	May-2011	01-Mar-2006	FL	79.70	550,000.00	518,732.00	01-Jul-2010	37	3.125%	59,023.94

EXHIBIT “4”

Resume of Marie McDonnell

AFFIDAVIT OF MARIE MCDONNELL ON BEHALF OF THOMAS J. LACASSE
In Re RESIDENTIAL CAPITAL, LLC, et al., USBC- SDNY, Debtor Case No. 12-12020

Marie Therese McDonnell

Mortgage Fraud and Forensic Analyst | Certified Fraud Examiner
15 Cape Lane ✪ Brewster, MA 02631 ✪ 774-323-0892
August 2013

PROFESSION: *Mortgage Fraud and Forensic Analyst, Certified Fraud Examiner*

OBJECTIVE: To Raise the Standard of Truth in Lending Through Auditing, Education, and Advocacy

RECENT ACCOMPLISHMENTS

RMBS Training, Expert Designations, Commissions, Engagements

Forensic Examination of the Essex Southern District Registry of Deeds – Massachusetts

- June 28, 2011: Commissioned by John L. Obrien, Register of Deeds for the Essex County (Southern District) Registry of Deeds in Salem, Massachusetts to perform a forensic examination to test the integrity of his registry due to his concerns that: 1) Mortgage Electronic Registration Systems, Inc. (“MERS”) propounds that its members can avoid recording assignments of mortgage if they register their mortgages into the MERS® System; and 2) due to the robo-signing scandal spotlighting Linda Green – an employee of DocX, LLC – as featured in a 60 Minutes exposé on the subject which first aired on April 4, 2011.
- The results of my audit revealed widespread, systemic, patterns of practice employed by or on behalf of several of the nations’ largest banks that had eroded the transparency and corrupted the chain of title to real property records maintained by the Essex Southern District Registry of Deeds. (See <http://salemdeeds.com/pdf/Audit.pdf>)
- This was the first registry audit of its kind in the United States and has since prompted other officials to audit their public land records and institute lawsuits against the banks and their private electronic recording utility, Mortgage Electronic Registration Systems, Inc.

United States of America v. Lorraine Brown – Case No. 3:12-cr-198-J-2S

- January 11, 2013: Submitted an Affidavit In Support of Register of Deeds John L. O’Brien’s Affidavit and Request For Restitution in the sentencing of Lorraine Brown, the founder the chief executive of DocX LLC (an LPS company), which was involved in the preparation and recordation of mortgage-related documents throughout the country since the 1990s.
- On November 20, 2012, Assistant U.S. Attorney General Lanny Breuer announced an agreement in which Brown plead guilty to conspiracy to commit mail and wire fraud. “Lorraine Brown participated in a scheme to fabricate mortgage-related documents at the height of the financial crisis,” said Assistant Attorney General Breuer. “She was responsible for more than a million [1,000,000] fraudulent documents entering the system, directing company employees to forge and falsify documents relied on by property recorders, title insurers and others.” (See <http://www.justice.gov/opa/pr/2012/November/12-crm-1400.html>)
- Register O’Brien was concerned that the DocX, LLC documents recorded against the title to his constituents’ properties are now void as a matter of law due to the admission of Lorraine Brown that they are forgeries. Moreover, these DocX, LLC filings (***most of which do not involve properties that are or have been in foreclosure***) are defective for other reasons and further compromise the good, clear and marketable title to real property that Register O’Brien’s constituents have a right to expect.

- Register O'Brien asked that I examine a sampling of the 10,567 DocX, LLC discharges and assignments that were recorded in his Registry of Deeds from 1998 through 2011. I found that the majority of these documents evidence gaps in the chain of title or constitute wild deeds because, among other defects, they fail to connect the original mortgagee with the entity who is discharging or assigning the mortgage. (See <http://www.mcdonnellanalytics.com/register-john-obrien-calls-on-court-for-restitution>)

Office of the Attorney General – State of New York

- March 22, 2012: Conducted a one-day training in the New York City Office of Attorney General Eric Schneiderman to educate Assistant Attorneys General (civil and criminal divisions), Assistant U.S. Attorneys, Special Agents and Investigators on the securitization of residential mortgage loans; the systemic breaches of the representations and warranties made to investors; and the fraudulent cover-up that has ensued in the wake of the mortgage meltdown and foreclosure crisis.

Office of the Inspector General – Federal Housing Finance Agency

- February 20 through February 22, 2013: Conducted a three-day training in Washington, D.C. under contract from the U.S. Treasury Department at the request of the Office of the Inspector General for the Federal Housing Finance Agency. The purpose of the training was to educate the attendees in various aspects of the Residential Mortgage Backed Securities marketplace; the function of Mortgage Electronic Registration Systems, Inc. in streamlining the sale and securitization of residential mortgage loans; the resultant corruption in our land evidence recording systems; and the use of tools and technologies for conducting market surveillance. Among the attendees were: Special Agents of the Office of the Inspector General, Department of Justice, Secret Service, Homeland Security, FBI, Assistant U.S. Attorneys, and Postal Inspectors.

Wolf v. Wells Fargo Bank, N.A., et al. – Cause No. 2011-36476

- January 18, 2013: ORDER DENYING MOTION TO STRIKE EXPERT. “On this day came to be heard Defendants’ *Daubert/Robinson* Motion to Strike Marie McDonnell from Testifying as Expert Witness. After considering the Motion, the Response, any argument by counsel, and the pleadings and evidence on file, the Court finds the Motion is not meritorious. It is therefore, **ORDERED** Defendants’ *Daubert/Robinson* Motion to Strike Marie McDonnell from Testifying as Expert Witness is **DENIED** in its entirety. It is further, **ORDERED** that Marie McDonnell may testify as an expert witness in the trial of this case. Signed this day of Jan. 18, 2013. Honorable Mike Engelhart, In the District Court of Harris County, Texas (Houston), 151st Judicial District.”
- May 1, 2013: ORDER GRANTING CLASS CERTIFICATION. On December 10, 2012, came on for hearing the Motion for Class Certification filed by plaintiffs Mary Ellen Wolf and David Wolf (collectively “Plaintiffs”). Having taken notice of and considered the Court’s entire file in this cause, all evidence and arguments of counsel, all accompanying affidavits and exhibits thereto, and all of the legal authorities and documents submitted in support of Plaintiffs’ Motion, and GOOD CAUSE appearing, **IT IS HEREBY ORDERED** that Plaintiffs’ Motion for Class Certification under Rule 42 of the Texas Rules of Civil Procedure is **GRANTED**.

Montgomery County, Pennsylvania v. MERSCORP, Inc. et al. – Case 2:11-cv-06968-JCJ

- June 25, 2013: Engaged to provide expert witness services by the law firm of Kohn, Swift & Graf, P.C. in their representation of Nancy Becker, Recorder of Deeds for Montgomery County in her lawsuit on behalf of all Pennsylvania counties against MERSCORP, Inc. and Mortgage Electronic Registration Systems, Inc. “to remedy the Defendants’ illegal scheme to avoid paying fees associated with properly recording mortgages and mortgage assignments in violation of Pennsylvania law.” (Excerpt from Complaint, Document #1, page 7 filed in the U.S. District Court, Eastern District of Pennsylvania)

PROFESSIONAL EXPERIENCE

Innovation of Forensic Mortgage Auditing, Title Examination & Securitization Analytics

McDonnell Property Analytics

Founder / President / CEO, 2010 – Present

- Train state and federal law enforcement and regulatory agencies regarding detection of invalid assignments, robo-signing, fraud and misrepresentation in mortgage and foreclosure instruments.
- Educate and consult with registers of deeds throughout the country regarding the degradation in chain of title to real property located in their jurisdiction.
- Design, execute and deliver company's title and securitization forensic reports to attorneys, consumers, registries of deeds, and other governmental agencies.
- Train staff attorneys, researchers, and general counsel.
- Expert in chain of title, securitization and truth in lending disputes between lenders and homeowners and disputes between governmental bodies and national banks.

Truth In Lending Audit & Recovery Services, LLC

Founder / Managing Member, 2006-present

- Continue the services provided by The Mortgage Counselor under the aegis of the LLC.
- Continuously develop mortgage analytic software tools and protocols.
- Provide litigation support and expert witness services to law firms throughout the country.
- Develop specialized knowledge and implement protocols to trace the ownership of residential and commercial mortgage loans that had been sold to secondary market investors and private label securitization deals.
- Provided content for two chapters of *Mortgage Wars: How You Can Fight Fraud and Reverse Foreclosure* by Iris Martin, copyright July 15, 2009.

The Mortgage Counselor

Owner, 1991-2006

- Audited thousands of residential mortgage loans on behalf of consumers and attorneys who represent homeowners in resolving disputes over mortgage origination and servicing practices.
- Provided litigation support and expert witness services to law firms throughout the country.
- Developed and implemented a Truth in Lending Analysis to assist consumers and their attorneys in identifying material disclosure violations that enabled homeowners to raise their extended right to rescind and cancel certain mortgage transactions pursuant to state and federal disclosure laws.
- Developed compliance examinations to detect indicia of predatory lending, unconscionable loan terms, and violations of state and federal consumer protection laws.
- Developed analytical software tools and protocols to forensically reengineer the loan servicing history of commercial and residential mortgage loan transactions featuring:
 - Truth In Lending Analysis. Determine whether Truth In Lending Disclosure Statement complies with Regulation Z, and that calculations accurately reflect mortgage contract and loan commitment.
 - Amortization Analysis. Set up control based on loan agreement; reverse engineer lender's interest calculation method; cross-reference lender's history with borrower's records; and track distribution of payments to principal, interest, escrow, late charges, suspense, corporate and all custodial accounts.

- **Escrow Analysis.** Set up escrow account dating to closing; track disbursements and credits to and from escrow; verify transactions with primary source data provided by borrower, taxing authority and other payees; and analyze lender's Annual Escrow Analysis checking for accuracy and conformance with Real Estate Settlement Procedures Act.
- Uncovered a mortgage fraud scheme, orchestrated by The Dime Savings Bank of New York, that led to Attorney General investigations in Massachusetts, New Hampshire and Connecticut and, ultimately, to multi-million dollar settlement awards and relief programs for consumers.

Marie McDonnell Real Estate Counselor

Owner, 1987-1991

- Represented residential and commercial clients on a single agency basis who wished to buy, sell and exchange real estate.
- Provided real estate counseling, consulting, and financial analysis to clients.

PROFESSIONAL LICENSES & DESIGNATIONS

Real Estate Transactions and Fraud Examinations

Certified Fraud Examiner, February 2010-present

Certified Exchange Consultant Designation from The Academy of Real Estate, High Honors, 1989

Graduate, Realtor's Institute Designation (G.R.I.), September 1988

Registered Real Estate Broker, February 1988-present

Registered Real Estate Salesperson, December 1986-1988

PUBLIC INTEREST PROJECTS

Undertaken on a *Pro Bono* Basis

Amicus Curiae

Eaton v. Federal National Mortgage Association

- *Supplemental Amicus Brief*, Massachusetts Supreme Judicial Court, January 30, 2012
- *Amicus Brief*, Massachusetts Supreme Judicial Court, September 30, 2011

U.S. Bank v. Ibanez and Wells Fargo Bank, N.A. v. LaRace

- *Amicus Brief*, Massachusetts Supreme Judicial Court, October 1, 2010
- *Evidence and the Burden of Proof in Documenting the Chain of Title in Securitized Mortgage Transactions*, Massachusetts Land Court, June 29, 2009
- *Amicus Affidavit and Analysis of Marie McDonnell*, Massachusetts Land Court, April 17, 2009

Investigations

Essex Southern District Registry of Deeds, Salem Massachusetts

- Commissioned by Register John O'Brien
- Forensic Examination of the Essex Southern District Registry, June 28, 2011

Speaking Engagements

Recorders Association of Missouri, Annual Convention

- ♦ Presenter, April 24, 2012

Massachusetts Continuing Legal Education, Multi-State National Mortgage Settlement

- ♦ Co-Chair, April 13, 2012

Constitutional Officers Association of New Jersey, Annual Convention

- ♦ Speaker, September 14, 2011

International Association of Clerks, Recorders, Election Officials & Treasurers, 40th Annual Convention

- ♦ Speaker, June 2011

O. Max Gardner III Bankruptcy and Foreclosure Fraud Defense Boot Camp

- ♦ Presenter, February 2011

O. Max Gardner III Bankruptcy Boot Camp, Co-Teacher, Session On Securitization

- ♦ December 2010

O. Max Gardner III Speaking on Securitization

- ♦ September 2010

Boston Bar Association, Recent Foreclosure Developments in Massachusetts, Presenter

- ♦ April 13, 2010

O. Max Gardner III Bankruptcy Boot Camp

- ♦ Co-Teacher, Session On Securitization, December 2009 and February 2007

O. Max Gardner III Bankruptcy Boot Camp

- ♦ Attendee, September 2006

RULE 26 DISCLOSURES

Testimony in Recent Cases within the Last Four Years

Hanan Shiheiber v. JPMorgan Chase Bank, N.A., et al.

- ♦ Superior Court of the State of California, County of San Mateo

Mary Ellen Wolf and David Wolf v. Wells Fargo Bank, N.A. as Trustee for Carrington Mortgage Loan Trust, et al.

- ♦ In the District Court of Harris County, Texas, 151st Judicial District, Cause No. 2011-36476.
- ♦ Qualified to testify as an expert by the Honorable Mike Engelhart on January 18, 2013.
- ♦ Certified as a Class Action by Order of the Court on May 1, 2013.

In RE: Square 67 Limited Partnership

- ♦ United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Case No. 12-31870-hdh11. Deposition, May 11, 2012. Testified at hearing, May 14, 2012.
- ♦ Qualified by the Honorable Harlin DeWayne Hale as a "Mortgage Securitization and Fraud Expert" at a hearing held on May 14, 2012.

Residential Funding Company, LLC v. Thomas J. LaCasse

- ♦ Judicial District at Stamford, DOCKET NO: FSTCV095011591S. Deposition, April 3, 2012.

Deutsche Bank National Trust Company as Trustee v. Jonathan Barry et al.

- ♦ United States District Court, District of Massachusetts, C.A. No. 1:08-cv-11141-NMG. Deposition, January 15, 2010.

In re: Gary Sheehan v. Litton Loan Servicing LP, et al.

- ♦ United States Bankruptcy Court, District of Massachusetts, Case No. 08-12030-WCH. Deposition, December 2, 2009.

QUALIFICATIONS

Formal Education, Professional Development, Self-Study

Merrimack College

North Andover, Massachusetts

- ♦ Bachelor of Arts in American Studies with a Minor in Biology

I graduated in 1970 with honors from Merrimack College, North Andover, Massachusetts earning a Baccalaureate in American Studies supported by a solid background in math and science. I entered college in the Fall of 1966 having had the equivalent of five (5) years of high school math. Courses included Fundamentals of Mathematics, Algebra I and II, Geometry I and II, Calculus I and II, and Trigonometry I and II. The first five of eight college semesters adhered to the strict curriculum required of Biology majors, and were heavily concentrated in science and math. Coursework included: two semesters of General Biology and General Chemistry with labs, Principles of Mathematics I and II; two semesters of Morphogenesis and Organic Chemistry with labs, Principles of Mathematics III and IV; Cellular Biochemistry, Advanced Botany and General Physics all with labs; and Structure of Invertebrates with lab.

My formal education has provided a solid foundation in applied mathematics and the use the scientific method which enables me to solve complex problems in my area of specialized knowledge. Beyond technical knowledge and skills, the day-to-day field experience I have acquired over the last twenty-five years in practice is unparalleled.

Association of Certified Fraud Examiners

Certified Fraud Examiner, February 2010

Member

CFE Courses

- ♦ Ethical Issues for Fraud Examiners, June 2012
- ♦ CFE Exam Review Course, February 2010
- ♦ Building Your Fraud Examination Practice, June 2005
- ♦ Communicating the Results of Your Fraud Examination, June 2005

Real Estate & Finance

American Real Estate Academy

- ♦ Salespersons Qualifying Course, October 1986
- ♦ Real Estate Brokers Course, January 1988
- ♦ Licensing Renewal Course, August 2002
- ♦ 1031 Exchange, April 2007
- ♦ Residential Rental Agency, April 2007
- ♦ Foreclosures Estate Sales And Auctions, April, 2007
- ♦ Residential Mortgage Loan Market & Credit Today, April 2007
- ♦ Seller Agency, April 2007

- ♦ Buyer Agency, April 2007

Commonwealth of Massachusetts

- ♦ Registered Real Estate Salesperson, December 1986
- ♦ Registered Real Estate Broker, February 1988

Massachusetts Association of Realtors

Earned Graduate, Realtor's Institute Designation (G.R.I.)

- ♦ Graduate Realtor's Institute I, February 1987
- ♦ Graduate Realtor's Institute II, April 1987
- ♦ Graduate Realtor's Institute III, September 1988
- ♦ HP-12C Calculator, October 1988
- ♦ Financing Concepts, November 1988

Commercial-Investment Real Estate Council

- ♦ CI 100: Marketing Techniques for Leasing and Selling Commercial Property, September 1988

National Counsel of Exchangors

Earned Designation of Certified Exchange Consultant from The Academy of Real Estate, High Honors

- ♦ Gold card Qualifying Course - Wally Walker, January 1989
- ♦ Trade Secrets of Exchanging - Warren G. Harding, July 1989

Miscellaneous Real Estate Courses

- ♦ Nothing Down - Robert Allen, November 1986
- ♦ Boot Camp - Tom Hopkins, January 1987
- ♦ Sales Training - Tom Hopkins, April 1987
- ♦ The Art of Real Estate Counseling - Charles Chatham, August 1988
- ♦ Tom Peters' Excellence 1991, April 1991

Real Estate Finance

- ♦ Complete Course on Discounted Mortgages - Carl Abe, April 1988
- ♦ International Financing - Robert Findling, October 1988
- ♦ Mortgage Buying Workshop - Mike Meeker, March 1990 and May 1990
- ♦ Roth IRA Wealthbuilding - Dyches Boddiford & Peter Fortunato, March 2001
- ♦ Private Lending - Dyches Boddiford, May 2001

Real Estate Acquisition

- ♦ Option Fundamentals - Jack Miller, June 2001
- ♦ Corporation & LLC Combo Class – Jack Miller, May 2002

Mortgage Auditing

Consumer Loan Advocates

- ♦ ARM AID-Mortgage Auditing Workshop, September 1991

Self-Study

- ♦ Understanding The Time Value of Money, Jack V. Michaels
- ♦ Mathematics of Finance, Cissell, Cissell & Flaspohler
- ♦ Handbook of Financial Mathematics, Justin H. Moore
- ♦ The Cost of Credit, National Consumer Law Center
- ♦ Forensic Accounting and Fraud Investigation for Non-Experts, Silverstone & Sheetz
- ♦ Financial Mathematics Handbook, Muksian
- ♦ Advanced Algebra, The University of Chicago School Mathematics Project
- ♦ Capitalization Theory and Techniques, Akerson

Structured Finance

Bloomberg Seminars

Self-Study: Books

- ♦ The Handbook of Mortgage-Backed Securities, Fabozzi (2001)
- ♦ Foundations of Financial Markets and Institutions, Modigliani & Ferri (1998)

- ◆ Bond Markets, Analysis and Strategies, Fabozzi (2000)
- ◆ Fixed Income Mathematics, Fabozzi (1997)

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- ◆ Legal Criteria for U.S. Structured Finance Transactions, Standard & Poors (2006)
- ◆ Common Terms in Structured Finance, Thatcher Proffitt, (2007)
- ◆ Structured Finance Glossary of Securitization Terms, Standard & Poors (2003)
- ◆ Securitization Glossary, Nomura (2004)
- ◆ Indexing Parties from Securitization Trusts and Mortgage-Backed Certificates into Land Record Indexes in the State of Georgia, Kobierowski (2008)
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- ◆ Understanding The Securitization Of Subprime Mortgage Credit, Ashcraft & Schuermann (2007) (FRB Study)
- ◆ Predatory Structured Finance, Peterson (2006)
- ◆ Regions Morgan Keegan: The Abuse of Structured Finance, Craig McCann, PhD, CFA (2008)
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- ◆ Turning a Blind Eye: Wall Street Finance of Predatory Lending, Engle & McCoy (2006)
- ◆ The Delinquency of Subprime Mortgages, Danis & Pennington-Cross (2003) SEC Research

Legal

Massachusetts Bar Association & Boston Bar Association

- ◆ Foreclosure Defense Training, September 1992
- ◆ Massachusetts Mortgage Foreclosures, June 1997
- ◆ Presenter: Recent Foreclosure Developments in Massachusetts, April 13, 2010

Practising Law Institute

- ◆ Consumer Financial Services Litigation, April 2001

O. Max Gardner III

- ◆ Bankruptcy Boot Camp, September 2006
- ◆ Speaking On Securitization Boot Camp- Co-Taught Session On Securitization, February 2007
- ◆ Bankruptcy Boot Camp- Co-Taught Session On Securitization, December 2009
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- ◆ Operation Strike Back – Bankruptcy and Foreclosure Fraud Defense Boot Camp, Presenter, February 2011

myLawCLE

- ◆ MERS and Securitization in Contested Foreclosure Litigation, August 2013

Regulations & Compliance

Massachusetts Bankers Association

- ◆ Bank Compliance Academy, November 1998

CUNA Mutual Group

- ◆ Truth In Lending School, July 1999

BankersOnline

- ◆ Truth In Lending – How To Audit Open-End Credit, December 2005
- ◆ How To Comply With The Rescission Rules, June 2006

Handbooks & Reference Tools

- ◆ Truth In Lending Comptroller's Handbook, Office of the Comptroller of the Currency, 2008
- ◆ National Consumer Law Center Manuals
- ◆ Handbook of Escrow Procedures, Chandler, Mortgage Bankers Association of America
- ◆ Handbook of Loan Administration, Mortgage Bankers Association of America

- ◆ Quality Control for Mortgage Servicers, Kider, Mortgage Bankers Association of America

Self-Study

- ◆ Truth In Lending Act, Regulation Z, Official Staff Commentary
- ◆ Real Estate Settlement Procedures Act, Regulation X
- ◆ Alternative Mortgage Transaction Parity Act
- ◆ Home Ownership Equity Protection Act
- ◆ Federal Trade Commission Act – Unfair and Deceptive Acts and Practices
- ◆ Truth-in-Lending Manual - Ralph C. Clontz, Jr.
- ◆ Truth in Lending - National Consumer Law Center
- ◆ Repossessions & Foreclosures - National Consumer Law Center
- ◆ Unfair and Deceptive Acts and Practices - National Consumer Law Center
- ◆ Mortgage and Consumer Loan Disclosure Handbook - Kenneth F. Hall
- ◆ Residential Mortgage Lending: State Regulation Manual - Negroni & Pfaff

Technology

COMP USA Computer Training

- ◆ Microsoft® Windows 95®, December 1996
- ◆ Microsoft® Excel Introduction 7.0, December 1996
- ◆ Microsoft® Excel 7.0 Tools & Techniques, December 1996
- ◆ Quicken 5.0 for Windows – Introduction, December 1996
- ◆ Microsoft® Introduction to Access 2.0, March 1997
- ◆ Microsoft® Access 7.0 – Level I, March 1997